

# Exhibit B

## UNITED STATES DISTRICT COURT

for the

## Western District of New York

Black Love Resists in teh Rust, et al.

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Plaintiff

City of Buffalo, NY, et al.

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Defendant

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Civil Action No. 18-cv-00719

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**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

New York State Department of Motor Vehicles

To:

(Name of person to whom this subpoena is directed)

**Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

See attached Schedule A

Place	National Center for Law and Economic Justice 50 Broadway, Suite 1500 New York, NY 10004-3821	Date and Time:
		June 15, 2023, 9:00 am

**Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: \_\_\_\_\_

CLERK OF COURT

OR

Claudia Wilner

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Signature of Clerk or Deputy Clerk

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Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) \_\_\_\_\_ Plaintiffs \_\_\_\_\_

, who issues or requests this subpoena, are:  
Claudia Wilner, NCLEJ, 50 Broadway, Ste. 1500, NY, NY 10004-3821, (212) 633-6967, wilner@nklej.org**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE***(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for (*name of individual and title, if any*) \_\_\_\_\_  
on (*date*) \_\_\_\_\_.

I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_

\_\_\_\_\_  
on (*date*) \_\_\_\_\_ ; or

I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

*Server's signature**Printed name and title**Server's address*

Additional information regarding attempted service, etc.:  
\_\_\_\_\_  
\_\_\_\_\_

## Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

### (c) Place of Compliance.

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

### (d) Protecting a Person Subject to a Subpoena; Enforcement.

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

#### (2) Command to Produce Materials or Permit Inspection.

**(A) Appearance Not Required.** A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

**(B) Objections.** A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

#### (3) Quashing or Modifying a Subpoena.

**(A) When Required.** On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

**(B) When Permitted.** To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

**(C) Specifying Conditions as an Alternative.** In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

### (e) Duties in Responding to a Subpoena.

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

**(A) Documents.** A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

**(B) Form for Producing Electronically Stored Information Not Specified.** If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

**(C) Electronically Stored Information Produced in Only One Form.** The person responding need not produce the same electronically stored information in more than one form.

**(D) Inaccessible Electronically Stored Information.** The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

#### (2) Claiming Privilege or Protection.

**(A) Information Withheld.** A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

**(B) Information Produced.** If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

#### (g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

**SCHEDULE A TO SUBPOENA TO  
NEW YORK STATE DEPARTMENT OF MOTOR VEHICLES  
REGARDING DRIVER'S LICENSE ADDRESS INFORMATION**  
***Black Love Resists in the Rust v. City of Buffalo***  
No. 1:18-cv-00719

This subpoena requires production of the electronically stored information described below in the possession, custody, or control of the New York State Department of Motor Vehicles (“DMV”). Production is to be made, at the election of the producing party, either (a) on removable media, such as a U.S.B. key or a DVD-ROM or (b) by upload to a secure file transfer site (details will be supplied on request).

The attached Schedule A-1 contains a list of New York State Driver's License numbers, each of which relates to one or more traffic tickets issued by the Buffalo Police Department. For each driver's license identified, please produce the driver's “address history” from January 1, 2020 to the present (the “Time Period”). That is, for each license number, please produce each address (including street address, city, state, and zipcode) shown as associated with that license number at any point in the Time Period, together with the date range for which the association is shown.

Please note that production of the driver's name is not requested.

Production shall be made in electronic form, preferably in an Excel spreadsheet in the format set forth in Schedule A-2. Schedule A-2 assumes that, for drivers with multiple addresses during the Time Period, there will be a separate row of the spreadsheet for each address. Plaintiffs are prepared to discuss form of production if needed. Schedule A-1 will also be made available in electronic form to assist in production.

**SCHEDULE A-1 TO SUBPOENA TO  
NEW YORK STATE DEPARTMENT OF MOTOR VEHICLES  
*BLRR v. CITY OF BUFFALO, 18-cv-719 (W.D.N.Y.)***

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000804716	007158660	022755552	029977707
001219163	007312951	022916788	030010633
001365568	007341503	022938544	030065161
001421747	007352357	023067035	030141538
001944358	007413616	023216875	030313537
002496592	007464962	023233304	030331929
002530485	008201496	023580707	030358100
002576767	008311974	024829150	030360023
002617900	008353257	025219166	030583347
002870293	008421511	025238328	030593022
003415721	008799248	025268502	030677423
003730274	008860076	025485439	030752867
004028330	008949638	025664523	030756269
004179591	009581852	025870800	030761206
004470190	009828014	026019572	030791201
004850939	009844061	026080000	031063085
004920703	009868054	026182992	031086430
004950833	010389780	026368456	031569962
005048315	010836526	026622998	031579432
005252505	011112637	026967910	031646601
005270589	011407848	027356396	031811042
006126102	012285328	027396396	031860078
006189896	012291076	027515604	031862447
006239928	012625408	027580341	031869995
006289533	015458650	027585023	031870167
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006466778	016523770	028284385	032413666
006477499	016528727	028318352	032470847
006518275	017120276	028710288	032478480
006636361	017245476	028719217	032484051
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006710333	018460303	029017090	032497536
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006770655	019517024	029105538	032563230
006787193	020719260	029121407	032611944
006822763	021035977	029182747	032654982
006923150	021248046	029201444	032692755
006928866	021317939	029275534	032703618

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032798219	039305770	046412780	060007382
032822131	039348100	047806381	060058939
032875887	039412899	047837112	060087190
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033070233	040433030	049411114	060446291
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033225294	041242300	050207544	060867847
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033698243	042310167	053050669	061229210
034011297	042910662	053322127	061297891
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034478876	043575734	055355089	061445133
034490802	043595662	055978966	061471236
034531797	043642297	056118808	061652423
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034906850	044192718	057020792	061778938
035169710	044252848	057511991	061817682
035258971	044335565	057524215	062038574
035381728	044346275	057679372	062130209
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035959445	044483610	057878202	062137769
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036668894	044853468	058787858	071681738
036687158	045105062	059340815	095876463
036885290	045225654	059522055	100043848
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037895112	045411787	059713154	100117637
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104161234	109409430	115877723	123402656
104297605	109809848	116056967	123456789
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**SCHEDULE A-2 TO SUBPOENA TO  
NEW YORK STATE DEPARTMENT OF MOTOR VEHICLES  
REGARDING DRIVER'S LICENSE ADDRESS INFORMATION  
*Black Love Resists in the Rust v. City of Buffalo***  
No. 1:18-cv-00719

This Schedule A-2 sets forth the form of production (rows and columns) for the address information requested in this subpoena. Production should be made in an Excel spreadsheet if possible, but a .csv or other flat file is acceptable if need be.

<u>License Number</u>	<u>Street Address</u>	<u>City</u>	<u>State</u>	<u>Zip</u>	<u>Begin Date</u>	<u>End Date</u>
0123456789	123 West 4th Street	Buffalo	NY	14201	1/1/2020	3/25/2021
0123456789	456 West 8th Street	Buffalo	NY	14205	3/26/2021	12/31/2022
5678901234	789 West 12th Street	Buffalo	NY	14215	1/1/2020	12/31/2022
9876543210	222 East 19th Street	Buffalo	NY	14218	4/15/2020	12/31/2022
etc.						